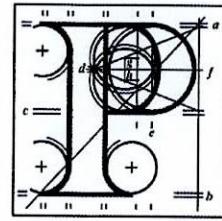


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Cllr Pamela Kearns  
203 Orwell Park Heights  
Templeogue  
Dublin 6W

**Date:** 18 August 2023

**Re:** Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme  
Templeogue/Rathfarnham to City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02A

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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## STRATEGIC INFRASTRUCTURAL DEVELOPMENT.

**An Bord Pleanála REF: Templeogue Rathfarnham Core Bus Corridor 316272**

**Pamela Kearns**

**203 Orwell Park Heights, Templeogue D6W.**

I wish to open my submission with the quote from Antonio Guterres UN secretary general **“The era of global warming has ended; the era of global boiling has arrived”**

<https://www.ft.com/content/657b50da-9a75-46b7-bf7c-020838f4f0a6>

so that I can assure the bord that I am completely cognisant of the rapidly worsening climate change emergency, and to reassure them that I am 100% supportive of all efforts to address the biggest challenge facing mankind today. Having said that I believe it is incumbent on me as a public representative to point out what I believe are some serious and rectifiable design flaws in the current Bus Connects Scheme.

As a lay person I found the 5,000 plus page submission made to your office by the applicant to be extremely difficult to navigate and I think that alone renders the idea of extensive meaningful public participation fanciful and disingenuous. As a result, I concentrated on the high impact areas where I feel special attention should be given. However, it should be noted that residents' associations such as OPTRA, WORK, Glendown, Butterfield and Recorders Residents Associations have made comprehensive submissions, I would like to add my support to their observations, and I applaud them for their contribution to their communities. There is a lot that is positive in the proposed scheme, and I acknowledge that and commend the applicant on their efforts.

I trust you will recognise my observations in the spirit in which they are intended and that is, to contribute to a better plan for everyone. I would encourage the board to examine the observations and submissions from the public with an open mind and look closely to see how this scheme could be improved for all the members of our community, the elderly, those that may be physically and intellectually challenged and those that need to make frequent visits to hospitals etc and will need a fast reliable and safe way to travel.

Some of my concerns are:

- Extensive and unnecessary tree removal
- Damage to the root system of the trees that remain in the woodland at Rathfarnham Castle.
- Negative impact on biodiversity on the castle grounds.
- Lack of sensitivity to the built heritage by replacing the boundary wall with a rendered replacement. (Rathfarnham Castle)
- I question the COPs on some of the sites in the area a number of which seem unnecessary to me.
- The visual impact on the area around Rathfarnham Castle because of the extensive tree removal.
- I question the placing and/or removal of a number of bus stops along the corridor and ask that the board examine these in light of the vulnerable groups I mentioned above.
- The displacement of traffic from the Templeogue Road to the surrounding areas of Wellington Lane, Cypress Grove Road and Templeville Road. Potentially 7,000 cars will be displaced daily.
- The impact on the traders in Templeogue Village.

I ask that Eamon Ryan Minister for the Environment, Climate, Communications and Transport to facilitate the progression of a Metro South West Scheme in tandem with the current Bus Connects Scheme. If we are serious about reducing private car use and tackling global warming, then I believe that this is the only truly viable long-term solution, and we can't keep kicking it down the road with short term expensive sticking plaster solutions. The time for action is now.

Sincerely,

Cllr. Pamela Kearns

Labour Party Representative for Rathfarnham Templeogue.

**An Bord Pleanála REF: Templeogue Rathfarnham Core Bus Corridor 316272 Pamela Kearns Rathfarnham Castle and Demesne boundary at Rathfarnham Castle Park.**

I note that the NTA Bus Connects plans for the above corridor proposes to remove to remove **400m long by 10m wide section, of mature woodland** from within the boundary wall of Rathfarnham Castle which is a protected structure as noted in the NTA application.

**17.4.3.2 Impact on Streetscape Elements and Visual Impacts**

**17.4.3.2.1 Architectural Conservation Areas**

*"The works will impact on the setting of the ACA through removal of mature trees within the castle grounds but the majority of the woodland group within the grounds will be retained thus retaining the strong edge to the ACA" Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme Chapter 17 Page 32*

**17.4.3.2.4 Protected Structures and National Monuments**

*"Rathfarnham Castle is a Protected Structure and a National Monument. There will be removal of substantial numbers of trees from the edge of the woodland which encompasses the castle demesne, for an approximately **400m long by 10m wide section**, however, the bulk of the trees on the edge of the demesne will be retained, thus preserving the setting of the Castle and its immediate grounds. The sensitivity is very high, and the magnitude of change is medium. (Refer also to Chapter 16 (Architectural Heritage)). Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme Chapter 17 Page 33*

**17.4.4.2.5 Amenity Designations**

*"There will be a change at Rathfarnham Castle Demesne, most notably there will be continuing adverse effects from loss of land and from trees removed during the Construction Phase. However, there will be provision of substantial tree planting to consolidate the woodland edge to the demesne and restore the recreational amenity, which will reduce the negative effects over the long-term. Overall, the effect will be initially negative in the short-term becoming neutral over the long-term. The sensitivity is high, and the magnitude of change is high" Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme Chapter 17 Page 41*

I am very concerned at the plans to remove approximately **400m long by 10m wide section, of mature woodland** and I question the arborist report. I am of the opinion that there will be a much higher tree loss than is proffered in the report and request that this be examined again if we are to meet our climate change commitments.

*"Forests are the lungs of the earth. They play a vital role in maintaining the health and well-being of both humans and the planet."* [EU forests: Commission adopts new guidelines to support tree planting actions and to protect old-growth forests \(europa.eu\)](#)

*"Protection of the environment goes hand-in-hand with the issue of climate change. By protecting and enhancing the natural environment, we can play our part in mitigating the threat of climate change."* [gov.ie - Climate Action and Environment \(www.gov.ie\)](#)

*"The works will disrupt the amenity of the ACA in the short-term but will have limited impacts on the key characteristics. The sensitivity is very high, and the magnitude of change is medium."*  
**Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme Chapter 17 Page 32**

I fail to see how such significant changes to the visual streetscape will not seriously impact on the "key characteristics" of the ACA.

I also fear the negative impact on biodiversity in the park. Biodiversity awareness and promotion is an area that South Dublin County Council have worked hard to encourage with local groups through their heritage officer and parks department, so that we can work towards meeting our climate change commitments. In my opinion, not only will the eco system be adversely affected by this ill-thought-out plan but it will also reflect negatively on our interaction with so many groups that are working hard locally to do what they can for our environment. Trust in the system could be lost for a long time if this proposal is not reviewed and adjusted.

#### **12.4.3.4.1.2 Habitat Loss as a result of Fragmentation of Foraging / Commuting Habitat and Commuting Routes**

*"Proposed works along the boundary of Rathfarnham Castle, comprising the relocation of the boundary wall, will result in the removal of the outermost section of mixed woodland (WD1) at this location. Habitats such as mixed woodland, may be used by foraging and commuting bats in the area. Given the peripheral nature of the section of woodland to be removed here and considering the extent of this habitat which will be retained, this will not result in any significant impact on local bat species."* [Chapter 12 - Biodiversity \(templeoguerathfarnhamscheme.ie\)](#)

*"Bats are protected under the EU Habitats Directive (92/43/EEC) which requires member states to establish a strict protection regime for them and their roosts. The lesser horseshoe bat, which is found only in the republic of Ireland, is also listed in Annex 11 of the directive, which means its habitats must be designated as Natura 2000 sites."* [batsprotected species eu policy - Search \(bing.com\)](#)

I am deeply concerned by what appears to be the cavalier attitude of the applicant to our bat population and our EU obligations as referenced above (*"Bats are protected under the EU Habitats Directive (92/43/EEC)"*) and I am very perturbed by the potential negative impact on biodiversity in the park. Working in line with National policy South Dublin County Council with the support of the Councillors have worked hard to promote awareness of the importance of biodiversity in our county/country.

*“Malcolm Noonan, Minister of State for Heritage, and Electoral Reform, has today announced a combined €2.7 million in funding for local biodiversity projects. Over €2.5 million is being awarded to local authorities to carry out biodiversity projects through the Local Biodiversity Action Fund (LBAF)”*

<https://www.gov.ie/en/press-release/953f9-minister-noonan-announces-27-million-funding-for-local-biodiversity-projects/>

It is my contention that if this plan goes ahead without further scrutiny, we will be in breach of our National Climate Action Plan and EU policy.

The applicant quotes **South Dublin Development Plan 2022 -2028** to support their proposal.

**(Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme Chapter 17 Page 17)**

#### **17.3.3.1 South Dublin Development Plan 2022 - 2028**

**Chapter 4 Green Infrastructure** *“sets out policies and objectives in relation to appropriate development, enhancement, and **protection of green infrastructure networks, including green infrastructure in urban areas**, watercourse network, public open space hierarchy and landscape setting and SuDS”. Figure 4.4 of the Plan identifies the Dodder River Corridor is noted as both a Core Area and a Primary GI Corridor.*

I fail to see how the principles of the County Development Plan are being upheld if we allow the unnecessary destruction of **“400m long by 10m wide section, of mature woodland”** in an urban area.

**Chapter 3 Natural Cultural and Built Heritage** *“There are **no Tree Preservation Orders (TPO)** along this section of Proposed Scheme; Table 3.3 of the Development lists Tree Preservation Orders (TPO) within the county, the nearest but outside of the Proposed Scheme is Dublin City Council Tree Preservation (Rathfarnham, Beaufort Downs) Order 1987. These trees are south of Grange Road close to where the Proposed Scheme commences, protection of green infrastructure networks, including green infrastructure in urban areas, watercourse network, public open space hierarchy and landscape setting”* **17.3.3.1 South Dublin Development Plan 2022 – 2028**

#### **17.4.4.1.2 Nutgrove Avenue to Terenure Road North**

*“The sensitivity of this section is high. The Operational Phase of the Proposed Scheme involves substantial changes along the corridor of the Proposed Scheme. Most notably there **will be continuing negative effects from loss of trees removed** during the Construction Phase at Rathfarnham Castle and along sections of residential properties along Rathfarnham Road.”* **Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme Chapter 17 Page 38**

I accept, as stated by the applicant that there are no trees with a preservation order within this proposed area however, I believe that removing so many trees is unnecessary and taking the easy option rather than looking for a less intrusive/ destructive way to reach the objective of the scheme. While I welcome the proposed landscaping works, I fail to see how it they will go anyway near mitigating the potential damage to the ecological fabric of the park and its environs.

### **17.4.3.2 Impact on Streetscape Elements and Visual Impacts**

#### **17.4.3.2.1 Architectural Conservation Areas**

*"There will be substantial works at the edge Rathfarnham ACA involving road widening and impacts on boundaries and trees at Rathfarnham Castle. The affected boundary walls to Grange Road and Rathfarnham Road are replacement boundaries built as part of previous road schemes. The boundary treatment to the Rathfarnham Road is poor, consisting of concrete block walling. The boundary treatment to the Grange Road is of higher quality and consists of coursed granite rubble, with railings and brick dressings near the pedestrian entrance to the park. The wide modern road corridor in this location has locally degraded the character of the ACA. "*

#### **17.4.3.2.4 Protected Structures and National Monuments**

*"Rathfarnham Castle is a Protected Structure and a National Monument. The existing boundaries to Rathfarnham Road and Grange Road are not original to the castle and were constructed as part of recent road widening works. The materials used for these boundaries varies in quality and there is no consistent use of material types resulting in an inharmonious boundary to the demesne. The Construction Phase will result in the removal of the modern boundary features and construction of a new roughcast render boundary wall at a setback location". (Refer also to Chapter 16 (Architectural Heritage)). Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme Chapter 17 Page 33.*

*" The boundary treatment to the Grange Road is of **higher quality** and consists of coursed granite rubble, with railings and brick dressings near the pedestrian entrance to the park". 17.4.3.2.4 Protected Structures and National Monuments." (Refer also to Chapter 16 (Architectural Heritage)). Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme Chapter 17 Page 33.*

#### **17.4.4.1.2 Nutgrove Avenue to Terenure Road North**

*"There will be the provision of a new boundary wall to the castle demesne in roughcast render which, **while less aesthetically pleasing** than the sections of existing stone boundary wall, will represent a neutral change when compared to the overall inharmonious boundary treatment which varies in quality and condition of materials used". Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme Chapter 17 Page 38*

#### **17.4.3.2.4 Protected Structures and National Monuments**

*The applicant has confirmed that "Rathfarnham Castle is a Protected Structure and a National Monument" with this in mind I am completely opposed to the proposal to replace the boundary wall with a cheap roughcast render "**less aesthetically pleasing**" wall. Bearing in mind the significant budget allocated for this scheme, I believe it is incumbent on the applicant to acknowledge and respect this sensitive area and treat it accordingly. I ask the board to insist that they use a finish more in keeping with a National Monument of such importance to the county and country.*

Thank you. Cllr Pamela Kearns